

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY - CAMDEN

PAMELA WHITE, as Administratrix *ad*  
*Prosequendum* of the ESTATE of PHILLIP GEORGE  
WHITE, Deceased; IYONNA HANNAH; and T.H., a  
minor, by and through his guardian, TAMYRA  
DOWNING,

Plaintiffs,

v.

CITY OF VINELAND;  
VINELAND POLICE CHIEF TIMOTHY CODISPOTI;  
LOUIS PLATANIA;  
RICHARD JANASIAK; and,  
JOHN DOES 1 through 10, individually and/or  
in their official capacities,

Jointly, Severally, and/or in the  
alternative,

Defendants

Civil Action  
16-cv-8308 (NLH/KMW)

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EXHIBITS IN SUPPORT OF MOTION FOR BIFURCATION

On behalf of the Defendant,  
the City of Vineland,

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EXHIBIT LIST

Exhibit A

City of Vineland documents numerically identified 002056 and 002059

Exhibit B

White autopsy report and supplemental report

Exhibit C

Witness statements

Exhibit D

White criminal record

Exhibit E

Guerrido-Lopez v. City of Allentown, 2016 U.S. Dist. LEXIS 40021 (E.D. Pa. Mar. 28, 2016)

Exhibit F

Deluccia v. City of Paterson, 2012 U.S. Dist. LEXIS 35855 (D.N.J. Mar. 15, 2012)

Exhibit G

Vives v. New York, 2003 U.S. Dist. LEXIS 1833 (S.D.N.Y.).

Exhibit H

Carson v. Syracuse, 1993 U.S. Dist. LEXIS 9508 (S.D.N.Y.).

Exhibit I

Ackerman v. Allen, 2017 U.S. Dist. LEXIS 64102 (N.D. Ill. Apr. 27, 2017).

Exhibit J

Asbury v. Connelly, 53 Fed. Appx. 655 (3d. Cir. 2002).

Exhibit K

Colon v. City of Newark, 2006 N.J. Super. Unpub. LEXIS 1094 (App. Div. 2006).

Exhibit L

Groark v. Timek, 2014 U.S. Dist. LEXIS 97551 (D.N.J. July 17, 2014).

Exhibit M

Brief in support of appeal of Order to produce Internal Affairs files (from the Costantino case)

Exhibit N

Dawson v. Ocean Township, 2011 U.S. Dist. LEXIS 25545 (D.N.J. Mar. 14, 2011).

Exhibit O

Transcript of Atlantic City's statistician's testimony (from the Costantino case)

Exhibit P

Atlantic City's statistician's report (from the Costantino case)

Exhibit Q

Excerpt from Plaintiff's statistician's report (from the Costantino case)

Exhibit R

Judge Kugler's order affirming Judge Schneider's ruling (from the Costantino case)

Exhibit S

Transcript of November 12, 2015 hearing (from the Costantino case)

Exhibit T

Worrall v. City of Atlantic City, 2013 U.S. Dist. LEXIS 118384 (D.N.J. August 20, 2013).

Exhibit U

Troso v. City of Atlantic City, 2013 U.S. Dist. LEXIS 163420 (D.N.J. November 15, 2013).

Exhibit V

Cordial v. Atlantic City, 2014 U.S. Dist. LEXIS 37630 (D.N.J. March 19, 2014).

Exhibit W

Alli Katt v. New York City Police Department, 1997 U.S. Dist. LEXIS 10014 (S.D.N.Y. 1997).

Exhibit X

Zanes v. City of Atlantic City, 2016 N.J. Super. Unpub. LEXIS 608 (App. Div. March 21, 2016)

Exhibit Y

Attorney General Internal Affairs Guidelines relevant provisions

Exhibit Z

Padilla v. Rutgers, 2015 N.J. Super. Unpub. LEXIS 2101 (App. Div. August 31, 2015).